

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO

JOANNE DAVIS	:	Civil Action No. 2:11-CV-00919
	:	
Plaintiffs,	:	
	:	Judge Edmund A. Sargus, Jr.
vs.	:	
	:	
JACKSON COUNTY MUNICIPAL	:	
COURT, et al.	:	
	:	
Defendant.	:	

**STIPULATED PROTECTIVE ORDER**

Defendant, Judge Mark Musick, in his individual capacity, as part of his discovery in the above-captioned matter, served a subpoena on the Ohio Department of Job & Family Services for the production of certain documents concerning the unemployment file of Beatrice Joanne Davis aka Joanne Davis, date of birth 9/20/1959. The State of Ohio agrees to produce the requested records under seal per the terms of this Order.

Accordingly, it is so ORDERED.

That the produced documents be marked “CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER.”

That such information and documents be considered confidential, and shall be disclosed under seal, subject to inspection only by:

1. The parties to this litigation and their agents;
2. Counsel for the parties to this litigation, including their support staffs;
3. Court reporters and recorders engaged in this action;
4. The service company that issued the subpoena for Judge Mark Musick, in his individual capacity;
5. Consultants, investigators, or experts (referred to collectively as “experts”) employed by the parties or counsel for the parties to assist in the preparation and trial of this action or proceeding; and
6. Other persons only by written consent of the producing party or upon order of the Court and on such conditions as may be agreed or ordered.

Counsel for the parties shall take reasonable and appropriate measures to prevent unauthorized disclosure of documents pursuant to the terms of this Order.

If a party intends to present at trial any of the documents pursuant to the terms of this Order, then such party shall provide advance notice to the other parties at least five (5) days before commencement of trial by identifying the documents or information at issue as specifically as possible (i.e., by Bates number, page range, deposition transcript lines, etc.) without divulging the actual documents or information. The Court may thereafter make such orders as necessary to govern the use of such documents or information at trial.

This Order shall be subject to modification by the Court on its own motion or on motion of a party or any other person with standing concerning the subject matter. Motions to modify this Order shall be served and filed under Local Rule 7.1.

This Order is entered based on the representations and agreements between the State of Ohio and the parties for the purpose of facilitating discovery.

*So Ordered.*

  
\_\_\_\_\_  
JUDGE EDMUND A. SARGUS, JR.

Dated: 1-12-2012

WE SO MOVE/STIPULATE  
and agree to abide by the  
by the terms of this Order

/s/Stephen A. Simon per phone  
consent

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Stephen A. Simon (0068268)  
Paul H. Tobias (0032415)  
Christopher R. Cline (0083853)  
Counsel for Plaintiff,  
Joanne Davis

Dated: January 6, 2012

WE SO MOVE/STIPULATE  
and agree to abide by the  
by the terms of this Order

/s/Charissa D. Payer

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Charissa D. Payer (0064452)  
Senior Assistant Attorney General for  
the State of Ohio

Dated: January 6, 2012

WE SO MOVE/STIPULATE  
and agree to abide by the  
by the terms of this Order

/s/Linda L. Woeber per phone  
consent

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Linda L. Woeber (0039112)  
Counsel for Defendant,  
Judge Mark Musick in his individual  
capacity

Dated: January 6, 2012

WE SO MOVE/STIPULATE  
and agree to abide by the  
by the terms of this Order

/s/Randall L. Lambert per email  
consent

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Randall L. Lambert (0017987)  
Counsel for Defendant,  
Jackson County and Judge Mark  
Musick in his official capacity

Dated: January 10, 2012